

## **IPSO annual statement for Johnston Press: 2016**

### **Introduction**

This is our third annual statement for IPSO and covers the period from 1 January 2016 to 31 December 2016.

The regulated entity Johnston Press is one of the largest local and regional multimedia organisations in the UK. We provide news and information services to local and regional communities through our portfolio of publications and websites - 13 paid-for daily newspapers, and approximately 250 other publications including: paid-for weekly newspapers, free titles, lifestyle magazines together with local news and e-commerce websites. A list of all our publications is set out at Schedule B of this Statement as at 31 December 2016.

Each month our regional news brands touch the lives of nearly 30m people across large parts of the UK including: Scotland, the North East, the North West, Yorkshire, the South, the Midlands, and Northern Ireland - delivering extensive coverage of local news, events and information.

Our acquisition of The i newspaper and the development and recent launch of the inews website (inews.co.uk) has also ensured that the company can deliver national news across a more expansive, national territory, including Northern Ireland.

We continue to set the highest editorial standards by ensuring that our staff are provided with excellent internally developed training services. The Editors' Code of Practice is embedded in every part of our editorial operations and we commit absolutely to the principles expounded by IPSO.

Johnston Press continues to operate an internal Editorial Governance Committee with the key remit to consider, draft, implement and review the policies, procedures and training for the whole Group to ensure compliance with its obligations under IPSO.

Copies of our relevant current policies are attached for your information. Gary Shipton is Deputy Chairman of our Editorial Board and chairman of our Editorial Governance Committee and Editor In Chief of our portfolio in Sussex; he is the Responsible Person (as defined in clause 3.3.9 of the Scheme Membership Agreement).

## **Our training process**

The Editors' Code is the standard used throughout the Group, including the recently acquired i publication. Our staff undergo training to ensure they fully understand the Editors' Code and know how to apply the code in real-life settings when seeking and drafting editorial content and dealing with any issues that may subsequently arise.

The Editorial Learning and Development Department provides an online training programme which tests staff on a range of scenarios which touch on various aspects of the Code and this module has been updated in 2016 to reflect more recent changes in the Editors' Code.

The advice of the IPSO Operations Director was sought in establishing this training and it was recognised as being one of the first such effective internal training programmes of its kind.

The Editors' Code is made available to new trainees joining the company and trainees are also put through the National Qualification in Journalism run by the National Council for the Training of Journalists. This includes training in ethical issues which is tested in the Media Law and Practice exam.

It is a condition of employment of all editorial staff, contained within their contracts, that they fully observe the standards required by the regulator as explained within the code. It is also a condition of commissioned freelance contributors that they fully comply with the code. This is also made clear through the induction process for all new editorial employees.

Law and ethics refreshers are an integral part of the Johnston Press training programme and the Editorial Learning and Development website includes material on ethical issues as well as the IPSO Code and Johnston Press complaints procedures.

Pre-publication guidance is provided in the first instances internally by the local content editor or editor and then, as required, by the group editor or editorial director. Significant questions in advance of publication will also be raised with the appropriate external and internal legal advisers as well as the 'responsible person' for regulated matters within JP. All editors have been informed of the IPSO contacts from which pre-publication advice should be sought. Johnston Press has a robust editorial management structure which ensures that whenever a story might require verification it is assessed by the local content editor or editor and then, as required, by the group editor or editorial director.

## **Our record on compliance**

Johnston Press publications have been the subject of just one adverse IPSO adjudication in 2016, as further specified in Schedule A below.

Whenever there is an adverse adjudication against a Johnston Press publication, it is referred to the company's editorial governance committee. The committee examines the censure in the context of other adjudications and then refers it back to the senior editorial director for the region responsible to conduct a full investigation. The investigation identifies the failings and the steps needed to ensure no repetition locally or across the group.

These recommendations can include training requirements and potential changes to the company's editorial policies and procedures. The report is then referred back to the governance committee for further consideration and then taken to the Editorial Board if substantive change needs to be approved. We have regularly sought clarification from IPSO when adjudications have been upheld against us so that we can fully understand the broader implications and adjust our internal guidance accordingly.

Following guidance from IPSO in 2016, we have amended our internal policies to ensure that we archive any digital content which we significantly changed in response to complaints about inaccuracy. The aim is to ensure that there is a screenshot of the original disputed content for the purposes of sharing with IPSO if the complainant is taken forward.

**Schedule A**  
**IPSO rulings upheld against Johnston Press**  
**(For the period 1 January 2016 to 31 December 2016)**

**07252-15 - Farrow v Lancashire Evening Post**

Kate Farrow, acting on behalf of Carly Potts' father Ian Farrow, complained to the Independent Press Standards Organisation that the Lancashire Evening Post breached Clause 3 (Privacy) and Clause 5 (Intrusion into grief or shock) of the Editors' Code of Practice in an article headlined "Student committed suicide in hotel room", published on 14 October 2015.

The complaint was upheld under 'Clause 5. The Committee required the publication of the adjudication.

**Schedule B**  
**Johnston Press publications**  
**(At 31 December 2016)**

The i

Bury Free Press; Bourne Local; Boston Standard; Diss Express; Peterborough Telegraph; Fenland Citizen; Lincs Free Press; Grantham Journal; Haverhill Echo; Horncastle News; Lynn News; Louth Leader; Market Rasen Mail; Melton Times; Newmarket Journal; Rutland Times; Suffolk Free Press; Spalding Guardian; Spilsby Standard; Mablethorpe Leader; Mildenhall Journal; Soham and Ely Journal; Skegness Standard; Sleaford Standard; Rutland and Stamford Mercury;

The Scotsman; Arbroath Herald; Cumbernauld News; East Fife Mail; Falkirk Herald; Fife Herald; Glenrothes Gazette; Glasgow South & Eastwood Extra; Kirkintilloch Herald; Lanark Gazette; Linlithgowshire Journal; Milngavie Herald; Motherwell Times; Paisley & Renfrewshire Extra; Arbroath Herald; Brechin Advertiser; Buchan Observer; The Buteman; Carrick Gazette; Donside Piper & Herald; Ellon Times; Forfar Dispatch; Fraserburgh Herald; The Galloway Gazette; Kincardineshire Observer; Mearns Leader; Montrose Review; Stornoway Gazette; Berwick Advertiser; Berwick Gazette; Berwickshire News; East Lothian News; Edinburgh Evening News; Hawick News; Midlothian Advertiser; Southern Reporter; Pulse Magazine; Scotland On Sunday; Selkirk Weekly Advertiser; Lothian Times.

Beverley Guardian; Driffield Times and Post; Scarborough News; Scarborough News; Bridlington Free Press; Pocklington Post; Malton & Pickering Mercury; Whitby Gazette; Harrogate Advertiser; Ripon Gazette; Wetherby News; Knaresborough Post; Pateley Bridge and Nidderdale Herald; North Yorkshire News; Brighouse Echo; Batley and Birstall News; Dewsbury and Mirfield Reporter; Halifax

Courier; Hemsworth & South Elmsall Express; Morley Observer and Advertiser; Pontefract & Castleford Express; Spenborough Guardian; Wakefield Express; Todmorden News and Hebden Bridge Times; Absolute Leeds; Yorkshire Evening Post; Leeds Weekly News; Pudsey Times; Wharfe Valley Times; Yorkshire Post.

Buxton Advertiser; Belper News; Derbyshire Times; Doncaster Free Press; Doncaster Star; Epworth Bells; Eastwood & Kimberley Advertiser; Eckington Leader; Gainsborough Standard; Gainsborough News; Hucknall Dispatch; Ilkeston Advertiser; Ashfield Chad; Alfretton Chad; Mansfield Chad; Matlock Mercury; Ripley & Heanor News; Sheffield Weekly Gazette; The Star, Sheffield; Sheffield Telegraph; Sheffield Weekly Gazette; Worksop Guardian; South Yorkshire Time; Eckington Leader; Peak Courier; Retford Trader Guardian, Dinnington Guardian; The Business Sheffield.

Berwick Advertiser; Berwickshire News; Galloway Gazette; Hartlepool Mail; Morpeth Herald; News Guardian; News Post Leader; Northumberland Gazette; Shields Gazette; Sunderland Echo; Peterlee Star; Washington Star.

Chorley Guardian; Colne Times; Garstang Courier; Longridge News; Lancashire Evening Post; The Visitor (Morecambe); Wigan Evening Post; Wigan Observer; Leigh Reporter; Wigan Reporter; Blackpool Gazette; Fleetwood Weekly News; Lytham St Annes Express; Lancaster Guardian; Leyland Guardian; Trials & Motorcross News; Clitheroe Advertiser and Times; Burnley Express; Nelson Leader; Dirt Bike Rider.

Bucks and Winslow Advertiser; Brackley and Towcester Advertiser; Bicester Review; Bedfordshire Times & Citizen; Banbury Guardian; Northampton Chronicle and Echo; Daventry Express; Northants Telegraph; Hemel Hempstead Gazette; Berkhamsted and Tring Gazette; Herald Express; Image Magazine; Leighton Buzzard Observer; Luton & Dunstable Herald & Post; Luton News; Harborough Mail; Milton Keynes Citizen; Northampton Mercury; Rugby Advertiser; Rugby Review; Biggleswade Chronicle; Dunstable Gazette; Lutterworth Mail; Corby Telegraph; Thame Gazette; Leamington Spa Courier; Warwick Courier; Kenilworth Weekly News.

Crawley Observer; West Sussex County Times series; Eastbourne Herald series; East Grinstead Gazette; Hastings and St Leonards Observer series; Mid Sussex Gazette; Mid Sussex Times; Sussex Express series; Chichester Observer series; West Sussex Gazette series; Worthing Advertiser; Worthing Herald series including the Littlehampton Gazette; Hayling Islander; The News, Portsmouth; Brighton and Hove Independent; Portsmouth View series.

Banbridge Leader; Dromore Leader; Ballymena and Antrim Times; Larne Times; Carrick Times; Newtownabbey Times; Ulster Star; Lurgan Mail; Portadown Times; Coleraine Times; Ballymoney Times; Derry Journal (and its editions); Tyrone Times; Mid Ulster Mail; Mid Ulster Mail, South Derry edition; Londonderry Sentinel; Roe Valley Sentinel; News Letter; Farming Life; Belfastvibe.

Etc Magazine (Northern Ireland); Etc Magazine Eastbourne; Etc Magazine North East; Etc Magazine North West; Etc Magazine East Sussex; Etc Magazine West Sussex; Etc Magazine North Sussex

Website	URL	Mobile URL
Arbroath Herald	<a href="http://www.arbroathherald.co.uk">www.arbroathherald.co.uk</a>	<a href="http://m.arbroathherald.co.uk">m.arbroathherald.co.uk</a>
Ballymena Times	<a href="http://www.ballymenatimes.com">www.ballymenatimes.com</a>	<a href="http://m.ballymenatimes.com/">m.ballymenatimes.com/</a>
Ballymoney Times	<a href="http://www.ballymoneytimes.co.uk">www.ballymoneytimes.co.uk</a>	<a href="http://m.ballymoneytimes.co.uk/">m.ballymoneytimes.co.uk/</a>
Banbridge Leader	<a href="http://www.banbridgeleader.co.uk">www.banbridgeleader.co.uk</a>	<a href="http://m.banbridgeleader.co.uk/">m.banbridgeleader.co.uk/</a>
Banbury Guardian	<a href="http://www.banburyguardian.co.uk">www.banburyguardian.co.uk</a>	<a href="http://m.banburyguardian.co.uk">m.banburyguardian.co.uk</a>
Batley News	<a href="http://www.batleynews.co.uk">www.batleynews.co.uk</a>	<a href="http://m.batleynews.co.uk">m.batleynews.co.uk</a>
Bedford Today	<a href="http://www.bedfordtoday.co.uk">www.bedfordtoday.co.uk</a>	<a href="http://m.bedfordtoday.co.uk">m.bedfordtoday.co.uk</a>
Belfast Newsletter	<a href="http://www.newsletter.co.uk">www.newsletter.co.uk</a>	<a href="http://m.newsletter.co.uk">m.newsletter.co.uk</a>
Belper News	<a href="http://www.belpernews.co.uk">www.belpernews.co.uk</a>	<a href="http://m.belpernews.co.uk">m.belpernews.co.uk</a>
Berkhamsted Today	<a href="http://www.berkhamstedtoday.co.uk">www.berkhamstedtoday.co.uk</a>	<a href="http://m.berkhamstedtoday.co.uk">m.berkhamstedtoday.co.uk</a>
Berwick Advertiser	<a href="http://www.berwick-advertiser.co.uk">www.berwick-advertiser.co.uk</a>	<a href="http://m.berwick-advertiser.co.uk">m.berwick-advertiser.co.uk</a>
Berwickshire News	<a href="http://www.berwickshirenews.co.uk">www.berwickshirenews.co.uk</a>	<a href="http://m.berwickshirenews.co.uk">m.berwickshirenews.co.uk</a>
Beverley Guardian	<a href="http://www.beverleyguardian.co.uk">www.beverleyguardian.co.uk</a>	<a href="http://m.beverleyguardian.co.uk">m.beverleyguardian.co.uk</a>
Bexhill Observer	<a href="http://www.bexhillobserver.net">www.bexhillobserver.net</a>	<a href="http://m.bexhillobserver.net">m.bexhillobserver.net</a>
Biggleswade Today	<a href="http://www.biggleswadetoday.co.uk">www.biggleswadetoday.co.uk</a>	<a href="http://m.biggleswadetoday.co.uk">m.biggleswadetoday.co.uk</a>
Blackpool Gazette	<a href="http://www.blackpoolgazette.co.uk">www.blackpoolgazette.co.uk</a>	<a href="http://m.blackpoolgazette.co.uk">m.blackpoolgazette.co.uk</a>
Bognor Regis Observer	<a href="http://www.bognor.co.uk">www.bognor.co.uk</a>	<a href="http://m.bognor.co.uk">m.bognor.co.uk</a>
Boston Standard	<a href="http://www.bostonstandard.co.uk">www.bostonstandard.co.uk</a>	<a href="http://m.bostonstandard.co.uk">m.bostonstandard.co.uk</a>
Bourne Local	<a href="http://www.bournelocal.co.uk">www.bournelocal.co.uk</a>	<a href="http://m.bournelocal.co.uk">m.bournelocal.co.uk</a>
Brechin Advertiser	<a href="http://www.brechinadvertiser.co.uk">www.brechinadvertiser.co.uk</a>	<a href="http://m.brechinadvertiser.co.uk">m.brechinadvertiser.co.uk</a>
Bridlington Free Press	<a href="http://www.bridlingtonfreepress.co.uk">www.bridlingtonfreepress.co.uk</a>	<a href="http://m.bridlingtonfreepress.co.uk">m.bridlingtonfreepress.co.uk</a>
Brighouse Echo	<a href="http://www.brighouseecho.co.uk">www.brighouseecho.co.uk</a>	<a href="http://m.brighouseecho.co.uk">m.brighouseecho.co.uk</a>
Brighton & Hove Independent	<a href="http://brightonandhoveindependent.co.uk">brightonandhoveindependent.co.uk</a>	

Buchan Observer	<a href="http://www.buchanobserver.co.uk">www.buchanobserver.co.uk</a>	<a href="http://m.buchanobserver.co.uk">m.buchanobserver.co.uk</a>
Buckingham Advertiser	<a href="http://www.buckinghamtoday.co.uk">www.buckinghamtoday.co.uk</a>	<a href="http://m.buckinghamtoday.co.uk">m.buckinghamtoday.co.uk</a>
Bucks Herald	<a href="http://www.bucksherald.co.uk">www.bucksherald.co.uk</a>	<a href="http://m.bucksherald.co.uk">m.bucksherald.co.uk</a>
Burnley Express	<a href="http://www.burnleyexpress.net">www.burnleyexpress.net</a>	<a href="http://m.burnleyexpress.net">m.burnleyexpress.net</a>
Bury Free Press	<a href="http://www.buryfreepress.co.uk">www.buryfreepress.co.uk</a>	<a href="http://m.buryfreepress.co.uk">m.buryfreepress.co.uk</a>
Buxton Advertiser	<a href="http://www.buxtonadvertiser.co.uk">www.buxtonadvertiser.co.uk</a>	<a href="http://m.buxtonadvertiser.co.uk">m.buxtonadvertiser.co.uk</a>
Carlisle Gazette	<a href="http://www.carlislegazette.co.uk">www.carlislegazette.co.uk</a>	<a href="http://m.carlislegazette.co.uk">m.carlislegazette.co.uk</a>
Carrick Gazette	<a href="http://www.carricktoday.co.uk">www.carricktoday.co.uk</a>	<a href="http://m.carricktoday.co.uk">m.carricktoday.co.uk</a>
Carrickfergus Times	<a href="http://www.carrickfergustimes.co.uk">www.carrickfergustimes.co.uk</a>	<a href="http://m.carrickfergustimes.co.uk">m.carrickfergustimes.co.uk</a>
Chichester Observer	<a href="http://www.chichester.co.uk">www.chichester.co.uk</a>	<a href="http://m.chichester.co.uk">m.chichester.co.uk</a>
Chorley Guardian	<a href="http://www.chorley-guardian.co.uk">www.chorley-guardian.co.uk</a>	<a href="http://m.chorley-guardian.co.uk">m.chorley-guardian.co.uk</a>
Clitheroe Advertiser	<a href="http://www.clitheroeadvertiser.co.uk">www.clitheroeadvertiser.co.uk</a>	<a href="http://m.clitheroeadvertiser.co.uk">m.clitheroeadvertiser.co.uk</a>
Coleraine Times	<a href="http://www.colerainetimes.co.uk">www.colerainetimes.co.uk</a>	<a href="http://m.colerainetimes.co.uk">m.colerainetimes.co.uk</a>
Crawley Observer	<a href="http://www.crawleyobserver.co.uk">www.crawleyobserver.co.uk</a>	<a href="http://m.crawleyobserver.co.uk">m.crawleyobserver.co.uk</a>
Cumbernauld News	<a href="http://www.cumbernauld-news.co.uk">www.cumbernauld-news.co.uk</a>	<a href="http://m.cumbernauld-news.co.uk">m.cumbernauld-news.co.uk</a>
Daventry Express	<a href="http://www.daventryexpress.co.uk">www.daventryexpress.co.uk</a>	<a href="http://m.daventryexpress.co.uk">m.daventryexpress.co.uk</a>
Deeside Piper	<a href="http://www.deesidepiper.co.uk">www.deesidepiper.co.uk</a>	<a href="http://m.deesidepiper.co.uk">m.deesidepiper.co.uk</a>
Derbyshire Times	<a href="http://www.derbyshiretimes.co.uk">www.derbyshiretimes.co.uk</a>	<a href="http://m.derbyshiretimes.co.uk">m.derbyshiretimes.co.uk</a>
Derry Journal	<a href="http://www.derryjournal.com">www.derryjournal.com</a>	<a href="http://m.derryjournal.com">m.derryjournal.com</a>
Dewsbury Reporter	<a href="http://www.dewsburyreporter.co.uk">www.dewsburyreporter.co.uk</a>	<a href="http://m.dewsburyreporter.co.uk">m.dewsburyreporter.co.uk</a>
Dirt Bike Rider	<a href="http://www.dirtbikerider.com">www.dirtbikerider.com</a>	<a href="http://m.dirtbikerider.com">m.dirtbikerider.com</a>
Diss Express	<a href="http://www.dissexpress.co.uk">www.dissexpress.co.uk</a>	<a href="http://m.dissexpress.co.uk">m.dissexpress.co.uk</a>
Doncaster Free Press	<a href="http://www.doncasterfreepress.co.uk">www.doncasterfreepress.co.uk</a>	<a href="http://m.doncasterfreepress.co.uk">m.doncasterfreepress.co.uk</a>
Donegal Democrat	<a href="http://www.donegaldemocrat.ie">www.donegaldemocrat.ie</a>	<a href="http://m.donegaldemocrat.ie">m.donegaldemocrat.ie</a>
Donside Piper	<a href="http://www.donsidepiper.co.uk">www.donsidepiper.co.uk</a>	<a href="http://m.donsidepiper.co.uk">m.donsidepiper.co.uk</a>
Driffield Post	<a href="http://www.driffieldtoday.co.uk">www.driffieldtoday.co.uk</a>	<a href="http://m.driffieldtoday.co.uk">m.driffieldtoday.co.uk</a>

Dromore Leader	<a href="http://www.dromoreleader.co.uk">www.dromoreleader.co.uk</a>	<a href="http://m.dromoreleader.co.uk">m.dromoreleader.co.uk</a>
Dunstable Today	<a href="http://www.dunstabletoday.co.uk">www.dunstabletoday.co.uk</a>	<a href="http://m.dunstabletoday.co.uk">m.dunstabletoday.co.uk</a>
East Lothian News	<a href="http://www.eastlothiannews.co.uk">www.eastlothiannews.co.uk</a>	<a href="http://m.eastlothiannews.co.uk">m.eastlothiannews.co.uk</a>
Eastbourne Herald	<a href="http://www.eastbourneherald.co.uk">www.eastbourneherald.co.uk</a>	<a href="http://m.eastbourneherald.co.uk">m.eastbourneherald.co.uk</a>
Eastwood Advertiser	<a href="http://www.eastwoodadvertiser.co.uk">www.eastwoodadvertiser.co.uk</a>	<a href="http://m.eastwoodadvertiser.co.uk">m.eastwoodadvertiser.co.uk</a>
Edinburgh News	<a href="http://www.edinburghnews.scotsman.com">www.edinburghnews.scotsman.com</a>	<a href="http://m.edinburghnews.scotsman.com">m.edinburghnews.scotsman.com</a>
Ellon Times	<a href="http://www.ellontimes.co.uk">www.ellontimes.co.uk</a>	<a href="http://m.ellontimes.co.uk">m.ellontimes.co.uk</a>
Epworth Bells	<a href="http://www.epworthbells.co.uk">www.epworthbells.co.uk</a>	<a href="http://m.epworthbells.co.uk">m.epworthbells.co.uk</a>
Falkirk Herald	<a href="http://www.falkirkherald.co.uk">www.falkirkherald.co.uk</a>	<a href="http://m.falkirkherald.co.uk">m.falkirkherald.co.uk</a>
Farming Life	<a href="http://www.farminglife.com">www.farminglife.com</a>	<a href="http://m.farminglife.com">m.farminglife.com</a>
Fenland Citizen	<a href="http://www.fenlandcitizen.co.uk">www.fenlandcitizen.co.uk</a>	<a href="http://m.fenlandcitizen.co.uk">m.fenlandcitizen.co.uk</a>
Fife Today	<a href="http://www.fifetoday.co.uk">www.fifetoday.co.uk</a>	<a href="http://m.fifetoday.co.uk">m.fifetoday.co.uk</a>
Filey Mercury	<a href="http://www.fileymercury.co.uk">www.fileymercury.co.uk</a>	<a href="http://m.fileymercury.co.uk">m.fileymercury.co.uk</a>
Fleetwood Weekly News	<a href="http://www.fleetwoodtoday.co.uk">www.fleetwoodtoday.co.uk</a>	<a href="http://m.fleetwoodtoday.co.uk">m.fleetwoodtoday.co.uk</a>
Forfar Dispatch	<a href="http://www.forfardispatch.co.uk">www.forfardispatch.co.uk</a>	<a href="http://m.forfardispatch.co.uk">m.forfardispatch.co.uk</a>
Fraserburgh Herald	<a href="http://www.fraserburghherald.co.uk">www.fraserburghherald.co.uk</a>	<a href="http://m.fraserburghherald.co.uk">m.fraserburghherald.co.uk</a>
Gainsborough Standard	<a href="http://www.gainsboroughstandard.co.uk">www.gainsboroughstandard.co.uk</a>	<a href="http://m.gainsboroughstandard.co.uk">m.gainsboroughstandard.co.uk</a>
Galloway Gazette	<a href="http://www.gallowaygazette.co.uk">www.gallowaygazette.co.uk</a>	<a href="http://m.gallowaygazette.co.uk">m.gallowaygazette.co.uk</a>
Garstang Courier	<a href="http://www.garstangcourier.co.uk">www.garstangcourier.co.uk</a>	<a href="http://m.garstangcourier.co.uk">m.garstangcourier.co.uk</a>
Glasgow South and Eastwood Extra	<a href="http://www.glasgowsouthandeastwoodextra.co.uk">www.glasgowsouthandeastwoodextra.co.uk</a>	<a href="http://m.glasgowsouthandeastwoodextra.co.uk">m.glasgowsouthandeastwoodextra.co.uk</a>
Grantham Journal	<a href="http://www.granthamjournal.co.uk">www.granthamjournal.co.uk</a>	<a href="http://m.granthamjournal.co.uk">m.granthamjournal.co.uk</a>
Guide and Gazette	<a href="http://www.guideandgazette.co.uk">www.guideandgazette.co.uk</a>	<a href="http://m.guideandgazette.co.uk">m.guideandgazette.co.uk</a>
Halifax Courier	<a href="http://www.halifaxcourier.co.uk">www.halifaxcourier.co.uk</a>	<a href="http://m.halifaxcourier.co.uk">m.halifaxcourier.co.uk</a>
Harborough Mail	<a href="http://www.harboroughmail.co.uk">www.harboroughmail.co.uk</a>	<a href="http://m.harboroughmail.co.uk">m.harboroughmail.co.uk</a>
Harrogate Advertiser	<a href="http://www.harrogateadvertiser.co.uk">www.harrogateadvertiser.co.uk</a>	<a href="http://m.harrogateadvertiser.co.uk">m.harrogateadvertiser.co.uk</a>



Hartlepool Mail	<a href="http://www.hartlepoolmail.co.uk">www.hartlepoolmail.co.uk</a>	<a href="http://m.hartlepoolmail.co.uk">m.hartlepoolmail.co.uk</a>
Hastings Observer	<a href="http://www.hastingsobserver.co.uk">www.hastingsobserver.co.uk</a>	<a href="http://m.hastingsobserver.co.uk">m.hastingsobserver.co.uk</a>
Haverhill Echo	<a href="http://www.haverhillecho.co.uk">www.haverhillecho.co.uk</a>	<a href="http://m.haverhillecho.co.uk">m.haverhillecho.co.uk</a>
Hawick News	<a href="http://www.hawick-news.co.uk">www.hawick-news.co.uk</a>	<a href="http://m.hawick-news.co.uk">m.hawick-news.co.uk</a>
Hayling Islander	<a href="http://www.haylingtoday.co.uk">www.haylingtoday.co.uk</a>	<a href="http://m.haylingtoday.co.uk">m.haylingtoday.co.uk</a>
Hebden Bridge Times	<a href="http://www.hebdenbridgetimes.co.uk">www.hebdenbridgetimes.co.uk</a>	<a href="http://m.hebdenbridgetimes.co.uk">m.hebdenbridgetimes.co.uk</a>
Hemel Today	<a href="http://www.hemeltoday.co.uk">www.hemeltoday.co.uk</a>	<a href="http://m.hemeltoday.co.uk">m.hemeltoday.co.uk</a>
Hemsworth and South Elmsall Express	<a href="http://www.hemsworthandsouthelmsallexpress.co.uk">www.hemsworthandsouthelmsallexpress.co.uk</a>	<a href="http://m.hemsworthandsouthelmsallexpress.co.uk">m.hemsworthandsouthelmsallexpress.co.uk</a>
Horncastle News	<a href="http://www.horncastlenews.co.uk">www.horncastlenews.co.uk</a>	<a href="http://m.horncastlenews.co.uk">m.horncastlenews.co.uk</a>
Houghton Star	<a href="http://www.houghtonstar.co.uk">www.houghtonstar.co.uk</a>	<a href="http://m.houghtonstar.co.uk">m.houghtonstar.co.uk</a>
Hucknall Dispatch	<a href="http://www.hucknalldispatch.co.uk">www.hucknalldispatch.co.uk</a>	<a href="http://m.hucknalldispatch.co.uk">m.hucknalldispatch.co.uk</a>
Ilkeston Advertiser	<a href="http://www.ilkestonadvertiser.co.uk">www.ilkestonadvertiser.co.uk</a>	<a href="http://m.ilkestonadvertiser.co.uk">m.ilkestonadvertiser.co.uk</a>
Inverurie Herald	<a href="http://www.inverurieherald.co.uk">www.inverurieherald.co.uk</a>	<a href="http://m.inverurieherald.co.uk">m.inverurieherald.co.uk</a>
Kenilworth Weekly News	<a href="http://www.kenilworthweeklynews.co.uk">www.kenilworthweeklynews.co.uk</a>	<a href="http://m.kenilworthweeklynews.co.uk">m.kenilworthweeklynews.co.uk</a>
Kincardineshire Observer	<a href="http://www.kincardineshireobserver.co.uk">www.kincardineshireobserver.co.uk</a>	<a href="http://m.kincardineshireobserver.co.uk">m.kincardineshireobserver.co.uk</a>
Kirkintilloch Herald	<a href="http://www.kirkintilloch-herald.co.uk">www.kirkintilloch-herald.co.uk</a>	<a href="http://m.kirkintilloch-herald.co.uk">m.kirkintilloch-herald.co.uk</a>
Kirriemuir Herald	<a href="http://www.kirriemuirherald.co.uk">www.kirriemuirherald.co.uk</a>	<a href="http://m.kirriemuirherald.co.uk">m.kirriemuirherald.co.uk</a>
Lancashire Evening Post	<a href="http://www.lep.co.uk">www.lep.co.uk</a>	<a href="http://m.lep.co.uk">m.lep.co.uk</a>
Lancaster Guardian	<a href="http://www.lancasterguardian.co.uk">www.lancasterguardian.co.uk</a>	<a href="http://m.lancasterguardian.co.uk">m.lancasterguardian.co.uk</a>
Larne Times	<a href="http://www.larnetimes.co.uk">www.larnetimes.co.uk</a>	<a href="http://m.larnetimes.co.uk">m.larnetimes.co.uk</a>
Leamington Courier	<a href="http://www.leamingtoncourier.co.uk">www.leamingtoncourier.co.uk</a>	<a href="http://m.leamingtoncourier.co.uk">m.leamingtoncourier.co.uk</a>
Leigh Reporter	<a href="http://www.leighreporter.co.uk">www.leighreporter.co.uk</a>	<a href="http://m.leighreporter.co.uk">m.leighreporter.co.uk</a>
Leighton Buzzard Observer	<a href="http://www.leightonbuzzardonline.co.uk">www.leightonbuzzardonline.co.uk</a>	<a href="http://m.leightonbuzzardonline.co.uk">m.leightonbuzzardonline.co.uk</a>
Leyland Guardian	<a href="http://www.leylandguardian.co.uk">www.leylandguardian.co.uk</a>	<a href="http://m.leylandguardian.co.uk">m.leylandguardian.co.uk</a>

Linlithgow Journal and Gazette	<a href="http://www.linlithgowgazette.co.uk">www.linlithgowgazette.co.uk</a>	<a href="http://m.linlithgowgazette.co.uk">m.linlithgowgazette.co.uk</a>
Littlehampton Gazette	<a href="http://www.littlehamptongazette.co.uk">www.littlehamptongazette.co.uk</a>	<a href="http://m.littlehamptongazette.co.uk">m.littlehamptongazette.co.uk</a>
Londonderry Sentinel	<a href="http://www.londonderrysentinel.co.uk">www.londonderrysentinel.co.uk</a>	<a href="http://m.londonderrysentinel.co.uk">m.londonderrysentinel.co.uk</a>
Longridge News	<a href="http://www.longridgenews.co.uk">www.longridgenews.co.uk</a>	<a href="http://m.longridgenews.co.uk">m.longridgenews.co.uk</a>
Louth Leader	<a href="http://www.louthleader.co.uk">www.louthleader.co.uk</a>	<a href="http://m.louthleader.co.uk">m.louthleader.co.uk</a>
Lurgan Mail	<a href="http://www.lurganmail.co.uk">www.lurganmail.co.uk</a>	<a href="http://m.lurganmail.co.uk">m.lurganmail.co.uk</a>
Luton Today	<a href="http://www.lutontoday.co.uk">www.lutontoday.co.uk</a>	<a href="http://m.lutontoday.co.uk">m.lutontoday.co.uk</a>
Lutterworth Mail	<a href="http://www.lutterworthmail.co.uk">www.lutterworthmail.co.uk</a>	<a href="http://m.lutterworthmail.co.uk">m.lutterworthmail.co.uk</a>
Lytham St Annes Express	<a href="http://www.lythamstannesexpress.co.uk">www.lythamstannesexpress.co.uk</a>	<a href="http://m.lythamstannesexpress.co.uk">m.lythamstannesexpress.co.uk</a>
Malton and Pickering Mercury	<a href="http://www.maltonmercury.co.uk">www.maltonmercury.co.uk</a>	<a href="http://m.maltonmercury.co.uk">m.maltonmercury.co.uk</a>
Mansfield and Ashfield Chad	<a href="http://www.chad.co.uk">www.chad.co.uk</a>	<a href="http://m.chad.co.uk">m.chad.co.uk</a>
Market Rasen Mail	<a href="http://www.marketrasenmail.co.uk">www.marketrasenmail.co.uk</a>	<a href="http://m.marketrasenmail.co.uk">m.marketrasenmail.co.uk</a>
Matlock Mercury	<a href="http://www.matlockmercury.co.uk">www.matlockmercury.co.uk</a>	<a href="http://m.matlockmercury.co.uk">m.matlockmercury.co.uk</a>
Mearns Leader	<a href="http://www.mearnsleader.co.uk">www.mearnsleader.co.uk</a>	<a href="http://m.mearnsleader.co.uk">m.mearnsleader.co.uk</a>
Melton Times	<a href="http://www.meltontimes.co.uk">www.meltontimes.co.uk</a>	<a href="http://m.meltontimes.co.uk">m.meltontimes.co.uk</a>
Mid Sussex Times	<a href="http://www.midsussextimes.co.uk">www.midsussextimes.co.uk</a>	<a href="http://m.midsussextimes.co.uk">m.midsussextimes.co.uk</a>
Mid Ulster Mail	<a href="http://www.midulstermail.co.uk">www.midulstermail.co.uk</a>	<a href="http://m.midulstermail.co.uk">m.midulstermail.co.uk</a>
Midhurst and Petworth Observer	<a href="http://www.midhurstandpetworth.co.uk">www.midhurstandpetworth.co.uk</a>	<a href="http://m.midhurstandpetworth.co.uk">m.midhurstandpetworth.co.uk</a>
Midlothian Advertiser	<a href="http://www.midlothianadvertiser.co.uk">www.midlothianadvertiser.co.uk</a>	<a href="http://m.midlothianadvertiser.co.uk">m.midlothianadvertiser.co.uk</a>
Milngavie Herald	<a href="http://www.milngavieherald.co.uk">www.milngavieherald.co.uk</a>	<a href="http://m.milngavieherald.co.uk">m.milngavieherald.co.uk</a>
Milton Keynes Citizen	<a href="http://www.miltonkeynes.co.uk">www.miltonkeynes.co.uk</a>	<a href="http://m.miltonkeynes.co.uk">m.miltonkeynes.co.uk</a>
Mirfield Reporter	<a href="http://www.mirfieldreporter.co.uk">www.mirfieldreporter.co.uk</a>	<a href="http://m.mirfieldreporter.co.uk">m.mirfieldreporter.co.uk</a>
Montrose Review	<a href="http://www.montrosereview.co.uk">www.montrosereview.co.uk</a>	<a href="http://m.montrosereview.co.uk">m.montrosereview.co.uk</a>

Morley Observer and Advertiser	<a href="http://www.morleyobserver.co.uk">www.morleyobserver.co.uk</a>	<a href="http://m.morleyobserver.co.uk">m.morleyobserver.co.uk</a>
Morpeth Herald	<a href="http://www.morpethherald.co.uk">www.morpethherald.co.uk</a>	<a href="http://m.morpethherald.co.uk">m.morpethherald.co.uk</a>
Motherwell Times	<a href="http://www.motherwelltimes.co.uk">www.motherwelltimes.co.uk</a>	<a href="http://m.motherwelltimes.co.uk">m.motherwelltimes.co.uk</a>
Newmarket Journal	<a href="http://www.newmarketjournal.co.uk">www.newmarketjournal.co.uk</a>	<a href="http://m.newmarketjournal.co.uk">m.newmarketjournal.co.uk</a>
News Guardian	<a href="http://www.newsguardian.co.uk">www.newsguardian.co.uk</a>	<a href="http://m.newsguardian.co.uk">m.newsguardian.co.uk</a>
News Post Leader	<a href="http://www.newspostleader.co.uk">www.newspostleader.co.uk</a>	<a href="http://m.newspostleader.co.uk">m.newspostleader.co.uk</a>
Newtownabbey Times	<a href="http://www.newtownabbeytoday.co.uk">www.newtownabbeytoday.co.uk</a>	<a href="http://m.newtownabbeytoday.co.uk">m.newtownabbeytoday.co.uk</a>
Northampton Chronicle and Echo	<a href="http://www.northamptonchron.co.uk">www.northamptonchron.co.uk</a>	<a href="http://m.northamptonchron.co.uk">m.northamptonchron.co.uk</a>
Northamptonshire Telegraph	<a href="http://www.northantstelegraph.co.uk">www.northantstelegraph.co.uk</a>	<a href="http://m.northantstelegraph.co.uk">m.northantstelegraph.co.uk</a>
Northumberland Gazette	<a href="http://www.northumberlandgazette.co.uk">www.northumberlandgazette.co.uk</a>	<a href="http://m.northumberlandgazette.co.uk">m.northumberlandgazette.co.uk</a>
Pendle Today	<a href="http://www.pendletoday.co.uk">www.pendletoday.co.uk</a>	<a href="http://m.pendletoday.co.uk">m.pendletoday.co.uk</a>
Peterborough Telegraph	<a href="http://www.peterboroughtoday.co.uk">www.peterboroughtoday.co.uk</a>	<a href="http://m.peterboroughtoday.co.uk">m.peterboroughtoday.co.uk</a>
Peterlee Star	<a href="http://www.peterleestar.co.uk">www.peterleestar.co.uk</a>	<a href="http://m.peterleestar.co.uk">m.peterleestar.co.uk</a>
Pocklington Post	<a href="http://www.pocklingtonpost.co.uk">www.pocklingtonpost.co.uk</a>	<a href="http://m.pocklingtonpost.co.uk">m.pocklingtonpost.co.uk</a>
Pontefract and Castleford Express	<a href="http://www.pontefractandcastlefordexpress.co.uk">www.pontefractandcastlefordexpress.co.uk</a>	<a href="http://m.pontefractandcastlefordexpress.co.uk">m.pontefractandcastlefordexpress.co.uk</a>
Portadown Times	<a href="http://www.portadowntimes.co.uk">www.portadowntimes.co.uk</a>	<a href="http://m.portadowntimes.co.uk">m.portadowntimes.co.uk</a>
Portsmouth News	<a href="http://www.portsmouth.co.uk">www.portsmouth.co.uk</a>	<a href="http://m.portsmouth.co.uk">m.portsmouth.co.uk</a>
Retford Trader and Guardian	<a href="http://www.retfordtoday.co.uk">www.retfordtoday.co.uk</a>	<a href="http://m.retfordtoday.co.uk">m.retfordtoday.co.uk</a>
Ripley and Heanor News	<a href="http://www.ripleyandheanornews.co.uk">www.ripleyandheanornews.co.uk</a>	<a href="http://m.ripleyandheanornews.co.uk">m.ripleyandheanornews.co.uk</a>
Ripon Gazette	<a href="http://www.ripongazette.co.uk">www.ripongazette.co.uk</a>	<a href="http://m.ripongazette.co.uk">m.ripongazette.co.uk</a>
Rugby Advertiser	<a href="http://www.rugbyadvertiser.co.uk">www.rugbyadvertiser.co.uk</a>	<a href="http://m.rugbyadvertiser.co.uk">m.rugbyadvertiser.co.uk</a>
Rutland Times	<a href="http://www.rutland-times.co.uk">www.rutland-times.co.uk</a>	<a href="http://m.rutland-times.co.uk">m.rutland-times.co.uk</a>
Rye and Battle Observer	<a href="http://www.ryeandbattleobserver.co.uk">www.ryeandbattleobserver.co.uk</a>	<a href="http://m.ryeandbattleobserver.co.uk">m.ryeandbattleobserver.co.uk</a>

Seaham Star	<a href="http://www.seahamstar.co.uk">www.seahamstar.co.uk</a>	<a href="http://m.seahamstar.co.uk">m.seahamstar.co.uk</a>
Selkirk Weekend Advertiser	<a href="http://www.selkirkweekendadvertiser.co.uk">www.selkirkweekendadvertiser.co.uk</a>	<a href="http://m.selkirkweekendadvertiser.co.uk">m.selkirkweekendadvertiser.co.uk</a>
Sheffield Telegraph	<a href="http://www.sheffieldtelegraph.co.uk">www.sheffieldtelegraph.co.uk</a>	<a href="http://m.sheffieldtelegraph.co.uk">m.sheffieldtelegraph.co.uk</a>
Shields Gazette	<a href="http://www.shieldsgazette.com">www.shieldsgazette.com</a>	<a href="http://m.shieldsgazette.com">m.shieldsgazette.com</a>
Shoreham Herald	<a href="http://www.shorehamherald.co.uk">www.shorehamherald.co.uk</a>	<a href="http://m.shorehamherald.co.uk">m.shorehamherald.co.uk</a>
Skegness Standard	<a href="http://www.skegnessstandard.co.uk">www.skegnessstandard.co.uk</a>	<a href="http://m.skegnessstandard.co.uk">m.skegnessstandard.co.uk</a>
Sleaford Standard	<a href="http://www.sleafordstandard.co.uk">www.sleafordstandard.co.uk</a>	<a href="http://m.sleafordstandard.co.uk">m.sleafordstandard.co.uk</a>
South Yorkshire Times	<a href="http://www.southyorkshiretimes.co.uk">www.southyorkshiretimes.co.uk</a>	<a href="http://m.southyorkshiretimes.co.uk">m.southyorkshiretimes.co.uk</a>
Spalding Guardian	<a href="http://www.spaldingtoday.co.uk">www.spaldingtoday.co.uk</a>	<a href="http://m.spaldingtoday.co.uk">m.spaldingtoday.co.uk</a>
Spenborough Guardian	<a href="http://www.spenboroughguardian.co.uk">www.spenboroughguardian.co.uk</a>	<a href="http://m.spenboroughguardian.co.uk">m.spenboroughguardian.co.uk</a>
St Helens Reporter	<a href="http://www.sthelensreporter.co.uk">www.sthelensreporter.co.uk</a>	<a href="http://m.sthelensreporter.co.uk">m.sthelensreporter.co.uk</a>
Stamford Mercury	<a href="http://www.stamfordmercury.co.uk">www.stamfordmercury.co.uk</a>	<a href="http://m.stamfordmercury.co.uk">m.stamfordmercury.co.uk</a>
Stornoway Gazette	<a href="http://www.stornowaygazette.co.uk">www.stornowaygazette.co.uk</a>	<a href="http://m.stornowaygazette.co.uk">m.stornowaygazette.co.uk</a>
Suffolk Free Press	<a href="http://www.suffolkfreepress.co.uk">www.suffolkfreepress.co.uk</a>	<a href="http://m.suffolkfreepress.co.uk">m.suffolkfreepress.co.uk</a>
Sunderland Echo	<a href="http://www.sunderlandecho.com">www.sunderlandecho.com</a>	<a href="http://m.sunderlandecho.com">m.sunderlandecho.com</a>
Sussex Express	<a href="http://www.sussexexpress.co.uk">www.sussexexpress.co.uk</a>	<a href="http://m.sussexexpress.co.uk">m.sussexexpress.co.uk</a>
Thame Gazette	<a href="http://www.thametoday.co.uk">www.thametoday.co.uk</a>	<a href="http://m.thametoday.co.uk">m.thametoday.co.uk</a>
The Buteman	<a href="http://www.buteman.co.uk">www.buteman.co.uk</a>	<a href="http://m.buteman.co.uk">m.buteman.co.uk</a>
The North Yorkshire News	<a href="http://www.northyorkshirenews.com">www.northyorkshirenews.com</a>	<a href="http://m.northyorkshirenews.com">m.northyorkshirenews.com</a>
The Scarborough News	<a href="http://www.thescarboroughnews.co.uk">www.thescarboroughnews.co.uk</a>	<a href="http://m.thescarboroughnews.co.uk">m.thescarboroughnews.co.uk</a>
The i	<a href="http://www.i.news.co.uk">www.i.news.co.uk</a>	<a href="http://m.i.news.co.uk">m.i.news.co.uk</a>
The Scotsman	<a href="http://www.scotsman.com">www.scotsman.com</a>	<a href="http://m.scotsman.com">m.scotsman.com</a>
The Southern Reporter	<a href="http://www.thesouthernreporter.co.uk">www.thesouthernreporter.co.uk</a>	<a href="http://m.thesouthernreporter.co.uk">m.thesouthernreporter.co.uk</a>
The Star	<a href="http://www.thestar.co.uk">www.thestar.co.uk</a>	<a href="http://m.thestar.co.uk">m.thestar.co.uk</a>
The Visitor	<a href="http://www.thevisitor.co.uk">www.thevisitor.co.uk</a>	<a href="http://m.thevisitor.co.uk">m.thevisitor.co.uk</a>

Thorne Gazette	<a href="http://www.thornegazette.co.uk">www.thornegazette.co.uk</a>	<a href="http://m.thornegazette.co.uk">m.thornegazette.co.uk</a>
TMX News	<a href="http://www.tmxnews.co.uk">www.tmxnews.co.uk</a>	<a href="http://m.tmxnews.co.uk">m.tmxnews.co.uk</a>
Todmorden News	<a href="http://www.todmordennews.co.uk">www.todmordennews.co.uk</a>	<a href="http://m.todmordennews.co.uk">m.todmordennews.co.uk</a>
Tring Today	<a href="http://www.tringtoday.co.uk">www.tringtoday.co.uk</a>	<a href="http://m.tringtoday.co.uk">m.tringtoday.co.uk</a>
Tyrone Times	<a href="http://www.tyronetimes.co.uk">www.tyronetimes.co.uk</a>	<a href="http://m.tyronetimes.co.uk">m.tyronetimes.co.uk</a>
Ulster Star	<a href="http://www.lisburntoday.co.uk">www.lisburntoday.co.uk</a>	<a href="http://m.lisburntoday.co.uk">m.lisburntoday.co.uk</a>
Wakefield Express	<a href="http://www.wakefieldexpress.co.uk">www.wakefieldexpress.co.uk</a>	<a href="http://m.wakefieldexpress.co.uk">m.wakefieldexpress.co.uk</a>
Warwick Courier	<a href="http://www.warwickcourier.co.uk">www.warwickcourier.co.uk</a>	<a href="http://m.warwickcourier.co.uk">m.warwickcourier.co.uk</a>
Washington Star	<a href="http://www.washingtonstar.co.uk">www.washingtonstar.co.uk</a>	<a href="http://m.washingtonstar.co.uk">m.washingtonstar.co.uk</a>
West Sussex County Times	<a href="http://www.wscountytimes.co.uk">www.wscountytimes.co.uk</a>	<a href="http://m.wscountytimes.co.uk">m.wscountytimes.co.uk</a>
West Sussex Gazette	<a href="http://www.westsussextoday.co.uk">www.westsussextoday.co.uk</a>	<a href="http://m.westsussextoday.co.uk">m.westsussextoday.co.uk</a>
Wetherby News	<a href="http://www.wetherbynews.co.uk">www.wetherbynews.co.uk</a>	<a href="http://m.wetherbynews.co.uk">m.wetherbynews.co.uk</a>
Whitby Gazette	<a href="http://www.whitbygazette.co.uk">www.whitbygazette.co.uk</a>	<a href="http://m.whitbygazette.co.uk">m.whitbygazette.co.uk</a>
Wigan Today	<a href="http://www.wigantoday.net">www.wigantoday.net</a>	<a href="http://m.wigantoday.net">m.wigantoday.net</a>
Worksop Guardian	<a href="http://www.worksopguardian.co.uk">www.worksopguardian.co.uk</a>	<a href="http://m.worksopguardian.co.uk">m.worksopguardian.co.uk</a>
Worthing Herald	<a href="http://www.worthingherald.co.uk">www.worthingherald.co.uk</a>	<a href="http://m.worthingherald.co.uk">m.worthingherald.co.uk</a>
Yorkshire Evening Post	<a href="http://www.yorkshireeveningpost.co.uk">www.yorkshireeveningpost.co.uk</a>	<a href="http://m.yorkshireeveningpost.co.uk">m.yorkshireeveningpost.co.uk</a>
Yorkshire Post	<a href="http://www.yorkshirepost.co.uk">www.yorkshirepost.co.uk</a>	<a href="http://m.yorkshirepost.co.uk">m.yorkshirepost.co.uk</a>

**Schedule C**  
**Johnston Press complaints policies**  
**(At 31 December 2016)**

**Internal Editorial Complaints Policy (FOR STAFF ONLY)**

**1. Internal Strategies for minimising complaints**

In line with Johnston Press's commitment to upholding standards in editorial quality and content, all Publishing Units should ensure that they strive to employ the following internal strategies in order to minimise the likelihood of complaints:

- external pre-publication legal advice for editorial operations should be sought, where considered appropriate and authorised by the relevant Editor who has legal and ethical responsibility for the publication, but with reference to the Editor In Chief/Editorial Director so costs are effectively managed;
- importance should be placed on the local content checking process;
- on-going training should be invested in each PU through their Editor In Chief/Editorial Director; such training should be centrally recorded by the Head of Editorial Learning and Development.

**2. Internal Process for resolving complaints**

This process considers complaints alleging a breach of the Editor's Code of Practice ("the Code") and which potentially fall under the remit of our Regulator, IPSO. Other complaints not alleging a breach of the Code should be considered in a similar way but without reference to IPSO.

All alleged breach of Code complaints <http://www.ipso.co.uk> must be submitted in writing to the relevant Editor with legal and ethical responsibility and must comprise the following:

- a copy of the article in question, if there is one;
- a written outline of the concerns by reference to the Code;
- any other documents which will help IPSO to assess the complaint

**\*NOTE: Code complaints should only be accepted where the complaint is received within four months from the date of the conduct or first publication of the article complained of OR up to 12 months of the first publication if it remains accessible on the Company's website.**

**The following internal process, including the Appeal, requires to be fully actioned and completed within a maximum of 28 days from receipt of the complaint:**

**On receipt of a complaint:**

- the relevant Editor In Chief/Editorial Director should **immediately** be informed and further action agreed in accordance with the external complaints policy.
- The Editor should **acknowledge receipt** of the complaint in writing within **five working days of receipt of the complaint** and confirm that the complaint will be investigated in accordance with JP's external complaints policy. Consideration should also be given as to whether the story is safe to leave on-line.

A letter confirming the outcome of the investigation should then be issued to the complainant ideally within **7 working days** from the acknowledgement letter and this should include the complainant's right to appeal the decision.

**Appeal**

Any appeal received in writing should be promptly forwarded to the relevant Editor In Chief/Editorial Director and dealt with in accordance with the external complaints policy and legal advice should be sought, where appropriate. The outcome of any appeal should be confirmed to the complainant within 7 working days of receipt of the appeal letter.

**\*\*Please note that IPSO can take over the handling of a complaint either once the Publisher's internal complaints procedures have been exhausted, or if the matter has not been resolved after 28 days. It is therefore important that we look to complete the process within the 28 day period.**

**IPSO**

If the matter is unable to be resolved internally then it may be referred to the complaints committee of IPSO and the company must respond to any requests for further information. IPSO will seek to mediate a resolution between the company and the complainant.

If the complaint cannot be resolved by mediation, IPSO will determine whether there has been a breach of the Code and will notify the complainant and the company of its decision.

The company must implement the decision of IPSO within the timescales and conditions determined by IPSO.

All the following complaints alleging a breach of the Code should be promptly logged into the Internal IPSO Complaints folder and the outcome of the process should also be logged (as this will form part of an annual statement to IPSO):

1. Solicitor's letter seeking redress
2. Any complaint that has been referred to IPSO
3. Any complaint referred to JP from IPSO

When logging any such complaint, you should also notify:

1. The relevant PU MD;
2. The Legal Director [REDACTED] and
3. The Head of Editorial Learning and Development for future training purposes

Where a complaint may lead to legal action by the complainant or such action is threatened, the Editor with reference to the Editor In Chief/Editorial Director should authorise seeking legal advice on the matter, if they believe it is required, from Foot Anstey solicitors (for English and Northern Irish claims) and Campbell Deane of Bannatyne, Kirkwood France & Co Solicitors (for Scottish Claims) (full contact details are available from the JP internal website). The Legal Director should also be notified [REDACTED] of the complaint at the same time.

### **3. IPSO Complaints Record**

The internal complaints recorded for each PU shall be reviewed and discussed on a quarterly basis by the JP IPSO editorial group in order to assess any identifiable training issues and/or requirement to tighten policies/procedures as well as for the purposes of preparing for the IPSO annual statement.

### **4. Retaining copies of articles**

Before making any substantive changes to an on-line article or other material in response to a complaint, editorial staff must archive a complete copy of the article or other material under complaint.

This does not include trivial changes such as spelling or grammar.

The archived copy must be retained for a minimum of four months from the time of amendment to ensure IPSO has a copy of the material should it receive a subsequent complaint.

The method of capture would be through screen shots taken via the Snipping Tool or Paint and it would be archived via a group shared document

We must ensure that all editorial staff responsible for amendments to on-line copy are made aware of this requirement. We will take all reasonable steps - including through training and reminders - to ensure relevant staff comply with the terms of this requirement.



### **Editorial Complaints Policy (External)**

Johnston Press is committed to upholding standards in editorial quality and content and acting in compliance with our regulatory guidelines and obligations.

We take all complaints about editorial content very seriously and seek to accordingly abide by the Independent Press Standards Organisation ("IPSO") requirements and its Editors' Code of Practice ("the Code").

When making a complaint, you must clearly state that your complaint is a formal complaint under this policy.

#### **What does this policy cover?**

This policy only applies to complaints about breaches of the Code in editorial content in our printed publications or on electronic services such as websites and apps, including text, pictures, video, audio/visual and interactive content, and which are either published or targeted at an audience in the UK, Channel Islands and Isle of Man. It does not cover:

- complaints about advertising (as that is regulated by the Advertising Standards Authority);
- concerns about matters of taste/decency and due impartiality;
- complaints about 'user generated content' (i.e. material on our websites that was not posted by us or on our behalf) which we have not reviewed or moderated;
- complaints about online material on sites which we do not own and which are not under our control;
- at our discretion, legal or contractual matters which are dealt with more appropriately in the courts or tribunals or elsewhere.

#### **How to complain**

Complaints should be made in writing, either by email to the Editor in question identified on the website of the publication to which the complaint relates to or by post to the address of the relevant publication and addressed in the first instance to the Editor. A copy of any complaint should also be copied to the Johnston Press head office email address at [enquiries@johnstonpress.co.uk](mailto:enquiries@johnstonpress.co.uk)

Complaints will only be accepted within four months from the date of the behaviour complained of or first publication of the article that you are complaining about. If at the time you submit your complaint, the article remains accessible on a website or other electronic service operated by us however, complaints may be accepted up to 12 months from the date of the behaviour or first publication of the article you are complaining about, provided it is still possible to investigate the complaint fairly given the period of time which has elapsed. Johnston Press shall have sole discretion in determining this.

**Complaints must include:**

- a copy of the article in question, or a link to the relevant webpage or a web address, if the complaint is about published material (or reference to the publication title, issue date, page and article title if a copy is unavailable);
- a written explanation of your concerns with reference to the Editors' Code;
- any other documents that will help us assess your complaint.

Complaints received without this essential information cannot be considered. We may however, at our discretion, seek further details from you after your initial contact. If you cannot provide any requested information we may be unable to consider your complaint.

We reserve the right to reject, without further investigation, complaints that show no breach of the Editors' Code, or those which are vexatious and/or disproportionate, or those which are without justification (such as an attempt to argue a point of view or to lobby).

We may also decline to consider complaints from third parties not directly affected by the alleged breach of the Editors' Code. When considering whether to accept such a complaint, the position of the party most closely involved in the matter will be taken into account.

**What happens to your complaint?**

The complaints process is free of charge irrespective of the outcome of your complaint

We aim to acknowledge receipt of your complaint within 5 working days of receipt. You in turn agree to respond promptly to any request for further information.

If we receive multiple complaints about the same issue we may choose to make one response to all such complaints.

We will aim to respond to complaints in writing within 7 working days of receiving everything we need from you to allow us to investigate your complaint.

We will always treat you courteously and with respect. We expect the same from you. We may decline to consider a complaint which is abusive or gratuitously offensive.

**Appeals process**

If you are dissatisfied with the outcome of your original complaint you have the right to appeal the decision by notifying the Editor, in writing, within 7 working days of receipt of the letter notifying you of the outcome.

Upon receipt of such appeal letter, the Editor, shall forward this for consideration to the Editor In Chief/Editorial Director of the relevant publishing unit, where appropriate, who will then aim to assess the appeal within 7 working days of receipt of such notification. After the Editor In Chief/Editorial Director has taken a decision in light of all the information made available at the time, you will be issued a letter confirming whether your appeal has been upheld or partially upheld and whether any actions will accordingly be taken.

For the avoidance of doubt, you will have no further right of appeal with the company following the determination of this appeals process. However, you may look to exercise your right to take the matter to IPSO.

#### **6. Complaint to IPSO on exhaustion of our complaints procedure**

If you are unhappy with our final response to your complaint you may complain to IPSO for consideration. Further details can be found at <http://www.ipso.co.uk>.

#### **7. Policy Changes**

We reserve the right to amend this policy as and when required. Members of the public can request a copy of this policy via the relevant editor or by emailing [enquiries@johnstonpress.co.uk](mailto:enquiries@johnstonpress.co.uk)

Any complaint will be considered against the published policy on the date of receipt of your complaint.